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5	ADAM K. ZICKERMAN State Bar No. 022320	
6	Attorney for the Defendant	
7	IN THE SUPERIOR COURT	OF THE STATE OF ARIZONA
8	IN AND FOR THE COUNTY OF COCONINO	
9		
10	STATE OF ARIZONA,	)
11	Plaintiff,	) Case No.: CR2017-0886
12	riamuii,	DEFENDANT'S RULE 15.2 ARIZ. R. CRIM. PROC.
13	VS.	)
14	JAMES WOMBLE,	)
15	Defendant	) )
16		_/
17	Pursuant to Rule 15.2, 17 <u>A.R.S.</u> <u>Rules of Criminal Procedure</u> , Defendant, through	
18	counsel, hereby makes the following disclosure:	
19	I. <u>Defenses</u>	
20	Defendant may rely on those defenses checked below:	
21	1) Failure of State to prove elements of offense	
22	2) Self Defense	
23	II. <u>Witnesses</u>	
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25		
40		

Defendant may call all persons named or referred to in the State's disclosure with respect to each of the designated defenses; the defendant himself may testify to each of the designated defenses. Additionally, defendant may call:

## <u>NAME</u> <u>ADDRESS</u> <u>TESTIFY AS TO DEFENSE NO.</u>

1) Names disclosed when known.

## III. Request For Full And Prompt Disclosure

To date, the State has either failed to provide disclosure or has only disclosed standard police reports containing limited information consisting primarily of the opinions of the officers involved in this case. Until the State makes full disclosure and until interviews can be conducted with the witnesses in this case, the defense is unable to make its full disclosure. The defendant therefore requests pursuant to Rule 15 A.R.Cr.P. 1) complete disclosure of all witness statements; 2) all <u>Brady</u> material; 3) all 404(b) prior bad act evidence; 4) 609 character evidence for all of the State's witnesses; and 5) interviews with all State witnesses. Prompt and good faith compliance with this request will serve to keep this case on track and help to guarantee a prompt resolution of this matter.

## IV. EXHIBITS

Defendant may use papers, documents, photographs, charts, diagrams, test results and other tangible objects at trial. Inspection may be arranged upon reasonable notice to defense counsel.

RESPECTFULLY SUBMITTED this 27 October 2017

Adam K. Zickerman Attorney for the Defendant